

## **Exhibit H**

**Angelina Casaletto**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X

ELAINE E. MANDELKOW., et al.,

**AFFIDAVIT OF  
ANGELINA CASALETTO**

Plaintiffs,

20-CV-00315 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X

STATE OF NEW JERSEY )

: SS.:

COUNTY OF MONMOUTH )

ANGELINA CASALETTO, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 13 Grandview Circle, Farmingdale NJ 07727.

2. My current age is 63, having been born on April 4, 1959.

3. I am the wife of Victor Casaletto, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My husband passed away from respiratory failure and end stage kidney disease on September 14, 2017. It was medically determined that these illnesses were causally connected to his exposure to toxins resulting from the 9/11 terrorist attacks.

5. We were a very active couple. We traveled, vacationed, and raised three children together. My husband was a big car enthusiast. He worked on restoring race cars. He was also a huge soccer fan, and we would travel to see soccer games as a family. Victor would take care of our cars, he would maintain our home and property, and he coached our children's soccer teams. We had a wonderful marriage. He was a loving father and a devoted husband. He was a

great guy.

6. Victor never drank, never smoked, and had no medical issues before 9/11. His family has longevity—his dad was ninety-two years old when he passed, his mother was in her late eighties. Both of his grandparents lived to a hundred years old. He was a soccer player. Totally healthy.

7. He worked at the New York Stock Exchange as a building engineer. On September 11, 2001, he was at the NYSE Building (located at 13 Wall Street) when the towers came down. He was there in the thick of it. He would tell me about what he saw on that day. He told me there was a woman running down the street barely dressed, with her clothes in tatters. Victor pulled her into the building and gave her a shirt and a bottle of water. She said she was out on the street when the towers came down, and the force of the explosion knocked her off her feet and dragged her through the street. His employer also ordered him to go onto the roof and shut off all the dampers so that the soot wouldn't enter the ventilation system of the building. He was up there on the roof, breathing in all the dust that filled the air. He stayed for five days around the clock at the New York Stock Exchange, getting the building ready to re-open. During that time, he was in and out of the building, helping Con Edison with the clean-up. He continued to work for the New York Stock Exchange until 2005, when he became so ill he couldn't work anymore.

8. Victor's health began to immediately decline after 9/11. He suffered from severe PTSD. He would get headaches and nosebleeds every night. He always felt sick, like he was having the flu. The doctors gave him antibiotics, thinking it was an infection, but the antibiotics didn't do anything. He was diagnosed with renal failure on December 27, 2005. His blood pressure skyrocketed, which caused the doctors to be perplexed. The nurse said with his blood pressure, he should be having a heart attack. We couldn't believe the renal failure, because he was such a healthy person before 9/11 with no family history of kidney disease. I talked to the doctors at Mount Sinai, and they said lots of first responders from Ground Zero were having kidney failure. He came down with skin cancers and blood disorders. He was just a mess.

9. Needless to say, nothing is the same when you're dealing with someone who is so ill for so long. No intimacy, no travel. He needed three days of dialysis just to go to Florida to see his parents. He couldn't even carry his luggage. This was the same man who used to build racecars. He couldn't eat what he wanted to eat. He couldn't do anything, couldn't do gardening




or maintain our home, so our son Daniel had to pick up the slack.

10. I was the transportation coordinator for our town's Board of Education. I took some time off to be my husband's caretaker. It was hard for me to keep my job and take care of my husband full-time. I couldn't just quit. Our family income had decreased since Victor was permanently disabled. I was fortunate to work close to home so I could run back and forth. He couldn't be alone, he couldn't drive. I'd drive him an hour each way to Robert Wood Johnson Hospital. I never took FMLA because I was afraid of losing my job. I had medical coverage through my work, and I wanted to make sure I didn't lose my healthcare coverage. His Medicare would not have covered it. The bills were astronomical—dialysis, fistula removal, and hospital stays. It was hard.

11. Victor was a very good man. He didn't need to stay at the NYSE that day to help, but he was out there helping people. He stayed to be a team player, and it cost him his life. He was a good man, a good father. My family lost a lot. We lost him that day. When Victor became permanently disabled, we lost a source of income for our family. When Victor died, I had to move houses because I couldn't afford our house anymore. If Victor was with us, he could've helped our children with their weddings and grandkids. All of that is gone. I lost my husband. I hope that those who caused or contributed to these attacks are held accountable for their actions. They'll never compensate for the loss of a life, but maybe this will allow families to move forward.

  
ANGELINA CASALETTO

Sworn to before me this  
24<sup>th</sup> day of April, 2022

  
Notary Public

JOANN D. PARKER  
A Notary Public of New Jersey  
My Commission Expires July 23, 2026

**Daniel Casaletto**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X

In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X

ELAINE E. MANDELKOW., et al.,

**AFFIDAVIT OF  
DANIEL CASALETTO**

Plaintiffs,

20-CV-00315 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X

STATE OF NEW JERSEY )

: SS.:

COUNTY OF HUDSON )

DANIEL CASALETTO, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 801 Palisades Avenue Apt 304, Union City, NJ 07087.

2. My current age is 33, having been born on September 24, 1988.

3. I am the son of Victor Casaletto, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My father passed away from respiratory failure and end stage kidney disease on September 14, 2017. It was medically determined that these illnesses were causally connected to his exposure to toxins resulting from the 9/11 terrorist attacks.

5. My father was very involved in my life. He coached my soccer team for two years. He got me interested in motorcycles, and we would always go to the dirt bike tracks when I was in middle school and high school. We would go to car shows. He and my grandpa

would take me to see the New York Cosmos soccer team games.

6. I was in eighth grade at the time of 9/11. My father was a building engineer for the New York Stock Exchange. He got stuck in lower Manhattan, because they locked the city down. He was there for many days. We didn't hear from him for the first day or two. I remember him coming home and being very upset. He didn't say "Hi" to us. He just went straight upstairs. He didn't want us to see him so upset, and he wanted to shield us from the trauma he witnessed. Later, he would tell me stories from that day. I became a building engineer too, so I understood what it would have been like for him. He told me how his manager made him go to the rooftop of the NYSE building to close the ventilation dampers that let air into the building. It was so dusty, he could hardly see two feet in front of him. He locked arms with the security guards to go out to the roof, breathing in the soot as he tried to close the dampers.

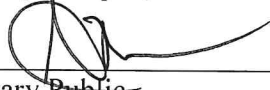
7. My dad started coming home from work with terrible headaches. He would come down with them after dinner. He would also have uncontrollable nosebleeds. This started in 2005 and happened for about two to three months straight. One day at the office, my dad started to experience severe pain. He was rushed to the hospital and diagnosed with renal failure. After that, he was in the hospital all the time. My mother and I always went to the hospital with him, but I would work night shifts so I could spend more time in him with the hospital. I witnessed his respiratory failure as well. We still tried to go to the dirt bike track and car shows, but he would have to stop often to catch his breath. He also suffered from neuropathy. My dad and I used to build racecars, and soon he couldn't even feel his feet on the car pedals from the neuropathy. That broke his heart and mine.

8. I'm the youngest of all my siblings, so I missed out on a lot with my father. He wasn't there for my wedding, the birth of my first child, or when I was accepted to Local 94 (International Union of Operating Engineers). It's an emotional challenge every day. My father was a good, honest, decent, and hard-working man. He provided for his family and always tried to give us a better life than he had growing up. My father was really looking forward to his retirement. I want to participate in this lawsuit because I want accountability for what was taken

away from my father, and us as a family.

  
DANIEL CASALETTO

Sworn to before me this  
12 day of April, 2022

  
\_\_\_\_\_  
Notary Public

ABDOLLAH REDA  
NOTARY PUBLIC OF NEW JERSEY  
My Commission Expires 12/7/2023

**Maria Inciardi**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X

ELAINE E. MANDELKOW., et al.,

**AFFIDAVIT OF  
MARIA INCIARDI**

Plaintiffs,

20-CV-00315 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X

STATE OF NEW JERSEY )

: SS.:

COUNTY OF MONMOUTH)

MARIA INCIARDI, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 37 Westbrook Way, Manalapan, NJ 07726.

2. My current age is 37, having been born on February 27, 1985.

3. I am the daughter of Victor Casaletto, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My father died from respiratory failure and end stage kidney disease on September 14, 2017. It was medically determined that these illnesses were causally connected to his exposure to toxins resulting from the 9/11 terrorist attacks.

5. I was very close with my dad. He was always very involved in my life. He was smart, certain, and strong-willed. I would ask him a lot of questions, and it seemed like he always had the answers. He was very involved with our extra-curricular activities. My dad was a huge soccer fan, so we started playing soccer. He was our number one fan. He coached all of our teams. He wanted to build a better life for us than he had when he was growing up. He



worked hard, working a lot of overtime, to buy our family a new house in New Jersey. He sent us to college, because he never got to go to college himself. He was the leader of our household, and he guided us. He was a central figure in our family unit.

6. My father worked at the New York Stock Exchange, located at 13 Wall Street. He was there on 9/11/2001 and witnessed the plane crash into the Twin Towers from the roof of the stock exchange building. He would later say to me that the explosion created by the plane crash was so great that he felt the heat of the flames on his skin. He was still on the roof when the first tower fell, and he got caught in the intense wave of debris and dust that flew out from the towers. We didn't hear from him for a few days after 9/11. Because he worked as a building maintenance engineer for NYSE, they couldn't let him go home. He was responsible for maintaining the security and operation of the building in the days after the attacks. When he finally came home, he was traumatized by what he had saw. He said people were in such pain and despair, that they killed themselves by jumping out of the World Trade Center on fire. He was horrified. After 9/11, my father continued to work at the New York Stock Exchange for about four or five years before retiring due to his illness.

7. I remember that my dad started to have really high blood pressure. His numbers were all over the place. At first, the doctors didn't know what was wrong. Before 9/11, he was an extremely healthy person. He had a great impact on my life when it came to fitness. He was very fit and active, he loved to run and play soccer. He was always in great shape. All of a sudden, he became totally deflated. He just didn't feel well, and he was tired all the time. There were times where he never felt well enough to even leave the house so we could go out to dinner as a family. He started to have respiratory issues and kidney issues. In the last few years of his life, he was in and out of the hospital all the time. The memory that stands out to me is when I had my first child. I was in the hospital, in labor, and my father was upstairs at the same hospital receiving a blood transfusion. It was just constantly getting checkups, bringing him to the doctor, and trying to figure out what was going wrong.

8. My mom dealt with my father's day-to-day care. She didn't want us to see firsthand the medical issues that he was going through. He didn't want us to see him going through terrible pain and at-home medical procedures like dialysis. I saw my father die. I lived in the same town as him in Central New Jersey. He was always in and out of the hospital, and one day he didn't make it out. I'll always have that last image in my mind of him in the hospital,

with the nurses trying to resuscitate him. It was very upsetting that that was the last time I got to see him. He tried so hard to shield us from the medical aspect of it all. But we were always involved in his illness. It was inescapable, and it made us all depressed.

9. His life was stolen from us, and that's why we joined this lawsuit. There needs to be accountability for his death and the deaths of others. It's upsetting that he worked his whole life providing for his family and then this happens. He had no control over it. He did everything right, and he got cheated. Times that should have been joyful are instead sad because he couldn't be there, or because he was too sick to enjoy them. He was still alive when I gave birth to my first child, but he looks terrible in all the pictures because he was dying. Now, I see people who would've been my father's age enjoying their retirement. It's a constant reminder that he got robbed. My dad wasn't even granted the time to enjoy the fruits of his labor. I see all my in-laws enjoy time with their grandchildren, and I wish that my dad had that too. But I have to go forward without him. It's a constant loss.

  
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MARIA INCIARDI

Sworn to before me this  
13 day of April, 2022

  
\_\_\_\_\_  
Notary Public

**MEAGAN N. PLICHTA**  
**NOTARY PUBLIC OF NEW JERSEY**  
**Comm. # 2442434**  
**My Commission Expires 1/28/2024**

**Kristina Ohring**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X

ELAINE E. MANDELKOW., et al.,

**AFFIDAVIT OF  
KRISTINA OHRING**

Plaintiffs,

20-CV-00315 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

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STATE OF NEW YORK     )  
                                      : SS.:  
COUNTY OF KINGS        )

KRISTINA OHRING, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 341 Union Street Apt 1, Brooklyn, NY 11231.

2. My current age is 35, having been born on February 2, 1987.

3. I am the daughter of Victor Casaletto, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My father died from respiratory failure and end stage kidney disease on September 14, 2017. It was medically determined that these illnesses were causally connected to his exposure to toxins resulting from the 9/11 terrorist attacks.

5. I was very close with my father. I consider him one of the pillars of my life. My father and I bonded through my extracurricular activities, particularly soccer. He was a very involved father. He worked many long hours during the week and would come home from work and coach my soccer team. He was dedicated to nurturing my and my siblings' interests. He spent a lot of time with us, and he taught us so much in school and life. He was a pillar in my



life and was incredibly influential in regards to who I've become.

6. I was in ninth grade on 9/11. My father was an employee of the New York Stock Exchange, right where 9/11 took place. He was present for the two plane collisions and was there the entire day throughout all of the chaos. Because he was a building operation engineer at the NYSE, he couldn't leave the city and was required to stay at the building. After 9/11, when the Financial District shut down, he was one of the few professionals who had to return to the area to make sure the structural sanctity of the building was still intact. He worked for the NYSE for four more years and retired when I was a freshman in college because he became so ill.

7. Shortly, if not immediately after 9/11, my father showed symptoms of severe PTSD. He would wake up screaming in the middle of the night. He was pre-occupied with the event and was always looking at photos on his computer of it. He would talk to us about it, seeking an outlet for his trauma. He complained that he was tired a lot, and he was very weak. We found out that he had kidney failure. His blood pressure spiked. He had nosebleeds all the time. In 2005, he had to retire due to his medical ailments.

8. Everything changed for our family. We went from a two-income household to a one-income household. In high school, as a young woman, I was acutely aware of the fact that things were economically and emotionally changing in my home. Our father was no longer of sound emotional mind. He was distraught, traumatized. He wasn't really "available" anymore to dedicate time to his hobbies and interests—he was depressed and withdrawn for several days at a time. It was very difficult to watch.

9. We were always pre-occupied with taking care of my father. Once he became ill, we were always involved with his hospital stays, blood transfusions, and surgeries. He was too sick to attend my college graduation. He was sidelined for so many milestones: graduations, awards, ceremonies, even weddings. My father passed away ten days before I gave birth to my son Samuel. I was at my second to last day of work before maternity leave, and my dad was sick in the hospital. My mom called me, and in the background, was the sound of my father flatlining on the electrocardiogram. She was screaming and crying. I ran out from my office, thirty-seven weeks pregnant and rushed to the hospital in New Jersey where my father was pronounced dead. The subsequent days were very troubling and traumatic. I was supposed to be preparing my body for the birth of my baby, but instead was preparing for the funeral of my

father. I had a difficult and complicated labor and delivery because I was not in the right emotional or physical state to give birth. I needed vacuum extraction to give birth. From there, I suffered post-partum depression. I didn't have time to grieve the death of my father. On top of that, I was cheated out of the happiness that one would usually have when they have a newborn.

10. I want to participate in this lawsuit to represent the families of hardworking Americans who showed up on the day of 9/11. They are regular people who got up every day to provide for their families, bravely doing so under uncertain conditions. These ordinary people, doing ordinary jobs, were affected by the heinous and unimaginable actions of others. The stories of these people and their families demonstrates that 9/11 will impact generations to come. My story is one example of how the trauma caused by 9/11 will last for lifetimes and generations.

  
KRISTINA OHRING

Sworn to before me this  
24<sup>th</sup> day of April, 2022

  
Notary Public

JOANN D. PARKER  
A Notary Public of New Jersey  
My Commission Expires July 23, 2024

**James Vincent Cassella**



UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X  
ELAINE E. MANDELKOW, et al.,

**AFFIDAVIT OF**  
**JAMES VINCENT CASSELLA**

Plaintiffs,

20-CV-00315 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

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STATE OF NEW JERSEY    )  
                                  : SS.:  
COUNTY OF SOMERSET    )

JAMES VINCENT CASSELLA, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 6 Prospect Drive, Somerville, New Jersey 08876.

2. I am currently 55 years old, having been born on January 19, 1967.

3. I am the son of Joseph Patrick Cassella, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. On October 16, 2016, my father passed away from pulmonary fibrosis and interstitial lung disease. It was medically determined that these illnesses were causally connected to his exposure to the toxins resulting from the September 11, 2001, terrorist attacks.

5. My father and I had a typical father-son relationship. We spent holidays, grandkids birthdays, and special occasions together. We spoke frequently on the phone, as we lived about an hour away from each other. My father lived in Jackson Heights, New York, and I lived in Somerville, New Jersey. I traveled a lot internationally for business, which made it difficult to physically see each other often, but I would often FaceTime, text, and call him. I

have lots of love, admiration, and respect for my father.

6. September 11<sup>th</sup> started out like any typical day for my father. He was in Brooklyn having breakfast with his crew. He worked as a mason for the City of New York in the Bridge Maintenance Program. He witnessed the first plane hit the North Tower from his location in Brooklyn. He was called to respond to the World Trade Center, as were all city employees. He assisted with recovery efforts. On that day, I couldn't get in touch with him because all the phone lines were down. Many of our family members were calling, asking me if he was okay. He worked at Ground Zero 12-18 hours per day, 7 days per week, for an extended period of time. Weeks, if not months. He suffered back pain from all the physical work. He told me that the environment made it difficult to breathe and that there was a lot of chaos. He saw many disturbing things, like deceased victims from the plane crash still strapped into their seats. He described long, hard hours, and people working together. It was a very sad time and an experience he never expected. What he witnessed deeply scarred him.

7. Shortly after he retired, my dad began to have issues breathing. At first, we just attributed it to old age and the fact that he had a physical job. He was often fatigued and wasn't feeling right. It was out of the ordinary for him since he was physically strong and active. He was used to hard, physical work, having worked in the masonry trade since he was a teenager. His doctor did some X-rays of his chest and then referred him to a pulmonary specialist. That specialist made the connection between his condition and his 9/11 exposure. In late 2014, my dad was diagnosed with pulmonary fibrosis.

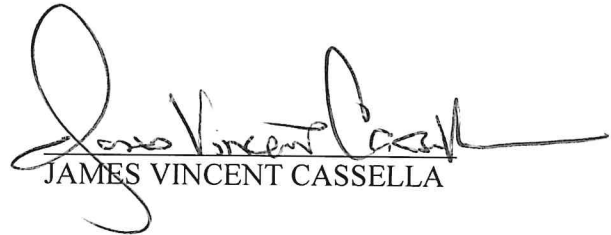
8. I was naïve at the time, I thought pulmonary fibrosis was a manageable condition, similar to asthma. I didn't realize it was a terminal illness. I was optimistic, thinking we'd send my father to respiratory therapy, put him on some treatments, and he'd be fine. However, his breathing problems continued to worsen. In late 2015, he had to start using an oxygen tank. The doctors put him on a number of drugs to open up his airways. He had a Symbicort inhaler and an albuterol inhaler. He had treatments to increase his lung capacity. He saw many different doctors and respiratory therapists. He went for second and third opinions. Toward the end, we had in-home care for him. It was difficult to watch him deteriorate.

9. My sister and I shared the responsibility of caring for him. I went to see him a number of times in the hospital and in his house. I would take him to doctors appointments, help

him with his medicine, and help him with simple daily tasks. I offered to buy him anything he needed. Fortunately, the World Trade Center Health Program and City of New York granted him disability benefits and covered most of his healthcare costs.

10. I thought we would have so much more time together. My father didn't even live as long as his parents. He was just entering retirement. Now, I don't have a father, and my kids don't have their grandfather. As his son, it saddened me to see my father work so hard his whole life and not be able to reap the rewards. He should still be alive, enjoying his life, spending time with his kids and grandkids. It's all he dreamed of.

11. My father was selfless on 9/11. He saw it as his responsibility to respond to the World Trade Center. Even if he had known what dangers were ahead of him, he still would have gone there to help. He made a sacrifice. We were robbed of the time we should have had with him. I'm glad to see that his name was included in the memorial of those who died of 9/11-related illnesses on Long Island. I wish we had more years together.

  
JAMES VINCENT CASSELLA

Sworn to before me this  
15<sup>th</sup> day of June, 2022

Tiago Ferreira  
Notary Public



June 15, 2022

**Lilian Chirico**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X

ELAINE E. MANDELKOW, et al.,

**AFFIDAVIT OF  
LILLIAN CHIRICO**

Plaintiffs,

20-CV-00315 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X

STATE OF FLORIDA       )  
                                  : SS.:  
COUNTY OF SEMINOLE    )

LILLIAN CHIRICO, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 2861 Sweetspire Circle, Oviedo, Florida 32766.
2. I am currently 60 years old, having been born on July 11, 1961.
3. I am the wife of Pat Chirico, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.
4. On December 27, 2017, my husband died from liver cancer. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.
5. Pat and I had a wonderful relationship. We enjoyed going away on vacation and were especially fond of taking cruises. We loved going on drives together, hosting barbecues, and going to Las Vegas for our anniversary. We had a very good life together and always got along well.



6. Pat was working as a police officer on September 11, 2001. He performed security and traffic control duties down at the World Trade Center. He worked all the time. He spent months working near the World Trade Center.

7. About a year before he died, Pat started to get sick. He complained of headaches, and his energy level dropped drastically. He was still working as a police officer during this time. He was always tired and had no energy to even take a walk. It felt like we were visiting doctors every weekend trying to figure out what was wrong with him. When we found out Pat had cancer, I was completely devastated.

8. I wanted to do whatever it would take to keep Pat alive, but he didn't want to go for any cancer treatments. He thought that if he spent all his money on his health, there wouldn't be enough money to take care of his family. He didn't want to go broke taking all of the necessary cancer tests. He wanted to make sure I was taken care of.

9. In early December 2017, Pat woke up and started spitting up blood. He passed out right on the floor. It scared me to death. I brought him to the hospital, where he went into a coma. The doctors told me that his organs were shutting down. I wanted to keep him as comfortable as possible, and I just kept asking the doctors to let him be. I tried everything I could to keep him alive for three weeks. I thought I could save him. Sadly, two days after Christmas, I lost him anyway.

10. Pat was my best friend, and I am lost without my best friend. It's been four years since he's gone. I have to take anxiety medication just to calm myself down. It's difficult to get through the day. My husband was a very kind person. He was a good person. This should have never happened to him at all. I miss him so badly that it hurts.

Lillian Chirico  
LILLIAN CHIRICO

Sworn to before me this  
30<sup>th</sup> day of April, 2022

Jelmie De Jesus Colon  
Notary Public  
Jelmie De Jesus Colon



Jelmie De Jesus Colon  
Comm.: HH232384  
Expires: Feb. 22, 2026  
Notary Public - State of Florida

STATE OF FLORIDA  
COUNTY OF SEMINOLE  
SWORN TO AND SUBSCRIBED  
BEFORE ME THIS 30<sup>th</sup> DAY OF  
April, 2022 BY Lillian Chirico  
TYPE OF IDENTIFICATION FL  
Driver's License

**Angelo Peter Christofilakes**



UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X  
ELAINE E. MANDELKOW., et al.,

**AFFIDAVIT OF ANGELO  
PETER CHRISTOFILAKES**

Plaintiffs,

20-CV-00315 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X  
STATE OF NEW YORK     )  
                              : SS.:  
COUNTY OF RICHMOND )

ANGELO PETER CHRISTOFILAKES, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 51 Windsor Road, Staten Island, NY 10314.
2. My current age is 72, having been born on September 8, 1949.
3. I am the brother of Chris Christofilakes, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.
4. My brother passed from glioblastoma on January 8, 2012. It was medically determined that this illness was causally connected to his exposure to toxins resulting from the 9/11 terrorist attacks.
5. I was ten years older than my brother. We had a really close relationship, practically like father and son. We did a lot of activities together over the years. We would ski together, we would go on vacations down the shore. Everything you could do, we did together. We were all very close as a family.

6. At the time of the 9/11 attacks, Chris was a court officer on Centre Street at the New York Supreme Court. He told me later on that he went down to the World Trade Center area to help, and he was working directly on the pile. I knew what he seen couldn't have been good. But Chris was a helper and that was the kind of person he was. No mask, no nothing. I asked him, "Why would you do that?" But nobody knew at the time what the real risks of exposure were. Chris worked up until around 2010 as a court officer.

7. He went on vacation several years later when he first starting showing neurological signs of the cancer. He had the shakes when he was on the beach on vacation, which turned out to be a minor seizure. We didn't know what it was at the time. We thought it was something minor at first and the doctors couldn't put their finger on the problem. After a long time, we learned that he had glioblastoma. Then, the doctors realized it was really serious. He underwent a resection at Columbia Presbyterian in January 2010 and survived a couple years following that surgery. Chris's wife was in the medical profession, and she wanted to get him the best care. They removed as much of the tumor as they could, but they couldn't get it all. He then went to physical therapy at Kessler and did well with physical therapy. I would bring him to New Jersey for his physical therapy and later for his chemotherapy and radiation. Every week, I would watch him as he received the intravenous chemotherapy. After a while, he looked pretty good. I told him, "Chris, I think it'd be good for you to go back to work." So, he went back to work, and it was great. He was happy.

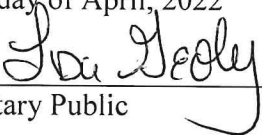
8. Several months later, his cancer recurred. It was tough. Even though it was a long time ago, it's always fresh in my mind. After a short time, he couldn't talk anymore. The brain cancer affected his speech. We did the best we could do, taking him to physical therapy again. He deteriorated very rapidly when the cancer came back. He was a tough kid, he never complained. He couldn't ambulate, and one side of his body was paralyzed from the tumor pressing on his brain. He couldn't move his legs either. We tried to help the best we could, because we wanted to do the right thing for him. But he was in a lot of pain at the end.

9. It was a terrible loss. We don't talk about it much. The shame of it is, the doctors can't do much about glioblastoma. They can remove as much of the tumor as they can, but they have no cure for it. It was hard to watch. He passed away at home, so it was equally hard to watch him go. Our family is religious, and I believe in the afterlife. I believe that we're going to meet Chris eventually. That's the way I see it. Even though it's been a long time since his

passing, I can never get it out of my memory. It was a really horrible time. I constantly think of him, and I try to think of the good times.

  
ANGELO PETER CHRISTOFILAKES

Sworn to before me this  
15<sup>th</sup> day of April, 2022

  
Notary Public



**Christopher John Christofilakes**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X  
ELAINE E. MANDELKOW, et al.,

**AFFIDAVIT OF  
CHRIS JOHN  
CHRISTOFILAKES**

Plaintiffs,

20-CV-00315 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X

STATE OF NEW JERSEY    )  
                                      : SS.:  
COUNTY OF HUDSON     )

CHRIS JOHN CHRISTOFILAKES, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 267 York Street Apt 4, Jersey City, NJ 07302.
2. My current age is 34, having been born on September 5, 1987.
3. I am the son of Chris Christofilakes, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.
4. My father passed away from glioblastoma on January 8, 2012. It was medically determined that this illness was causally connected to his exposure to toxins resulting from the September 11, 2001 terrorist attacks.
5. My father raised me. We worked together around the house on a lot of projects. We fixed things, did renovations, and we spent a lot of time together. He taught me everything that I didn't learn at school or that my mother didn't teach me. He taught me how to swing a hammer, use power tools, things like that. I loved working on our house with my dad, making it



a better place for our family to live. Later in life, I became an engineering technician. I attribute my success to the lessons my father taught me growing up.

6. My father was working in lower Manhattan as a court officer on the day of September 11<sup>th</sup>, 2001. I don't believe he was downtown when the buildings fell, but he responded to the scene immediately after. We were nervous, but we soon learned that he survived the initial attack. He spent several days working on the pile, performing search and recovery, barely even sleeping. He came home four days after 9/11 to get some rest. He then went back to Ground Zero for a few more days to work on the clean-up effort. He continued to work in the downtown area for the next several years until his retirement. He was based at the courts on Centre Street and Beaver Street.

7. Years later, my dad had injured his right arm and had some damage to his wrist. He consequently lost motor function in his arm. Doctors thought the motor loss was from the injury, but it was actually the first sign of his brain cancer. My father was diagnosed with Stage IV glioblastoma in the Fall of 2009. My parents broke the news to us, and we learned that it was the worst type of brain cancer a person could get. He went through a brain surgery in the beginning of 2010. He also underwent radiation and chemotherapy. The side effects from the chemotherapy were very detrimental—all his hair fell out, and he lost dozens of pounds in muscle and body mass. He looked like a skeleton. The cancer and treatments were extremely tolling on his body. In the beginning, he kept his spirits up, but that could only last so long.

8. Watching him wither away so quickly was painful. Towards the end, he lost the ability to speak or move. He was trapped in his own body. I could never imagine the pain of living through that. He was a very outgoing person, so for him to not be able to speak was excruciating. It was just unfathomable to imagine the way that he felt.

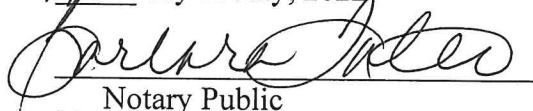
9. We didn't have enough time with him. We could've never spent enough time with him. We pitched in to do more around the house after he got sick, but the burden of caring for him fell to my mother. She bore the load of his care more than the rest of us did.

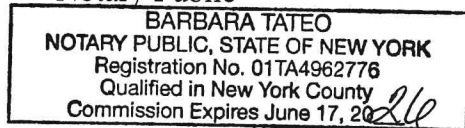
10. My father was loved by all. When he died, the court officers gave him a true hero's sendoff, bagpipes and all. He was surrounded by friends and family when he died. I think the worst part about his death is that he never got to see his children succeed. We had all finally reached an age where we were self-sufficient. He never got to see me in my uniform when I was

in the service. He missed a lot of the good parts of life. Knowing that he put all this effort into his children and his life, and then getting nothing from it, it's unfair. The unfairness is the worst part.

  
CHRIS JOHN CHRISTOFILAKES

Sworn to before me this  
14<sup>th</sup> day of July, 2022

  
Notary Public





**Demetra Christofilakes**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X

ELAINE E. MANDELKOW., et al.,

**AFFIDAVIT OF  
DEMETRA CHRISTOFILAKES**

Plaintiffs,

20-CV-00315 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X

STATE OF NEW YORK     )  
                                  : SS.:  
COUNTY OF RICHMOND    )

DEMETRA CHRISTOFILAKES, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 285 Cornelia Avenue, Staten Island, NY 10312.

2. My current age is 74, having been born on April 7, 1948.

3. I am the sister of Chris Christofilakes, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My brother passed away from glioblastoma on January 8, 2012. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. I was significantly older than Chris, so he was more like my son than my brother. I took care of him for most of my life. If he needed something, he would call me. Every morning at 8:30 am, from the time he was twenty years old to the time he could no longer speak, we would talk on the phone. He was supposed to live a long life, so when I got older he would take care of me. Many of the things he did throughout his life were with my instruction

or encouragement. I remember driving Chris to his physical examination for becoming a court officer. We were a very integral part of each other's lives.

6. Chris worked at the New York Supreme Court as a court officer in lower Manhattan. When he didn't come home on 9/11, my sister-in-law got a phone call from him saying he was going down there. He drove down and worked on the pile for five days. He came home, took a shower, and went right back down to the pile for another week. He had a tremendous amount of exposure. We told him, "You should wear a mask," but he thought it was unnecessary.

7. I saw Chris frequently, and noticed that something had changed about him. In the October before he was diagnosed, I noticed a difference in his gait and posture. He wasn't walking the same, and one shoulder was decisively lower than the other. He thought it was just because he had a torn rotator cuff. He got an MRI without contrast, which didn't show anything in his brain. Then, he and his wife went on vacation, and he had trembling and contortions. They did an MRI with contrast in December 2009. When those results came back, the neurologist called my brother and his wife to tell them he had a huge mass in his brain.

8. My sister-in-law worked for orthopedics at Maimonides. She made a phone call, and we all went en masse to Mount Sinai to see a neurologist. The doctor there told us Chris's tumor was inoperable. We saw another doctor at Columbia, who told us he could operate on the tumor. That doctor said, "There's no cure, but I can remove part of the tumor to extend Chris's life a little bit." That was in January 2010. The whole family went to his surgery. It was very difficult for Chris, as he ended up becoming partially paralyzed and had a number of grand mal seizures while he was in the ICU. After the hospital, he went to inpatient rehabilitation at Kessler for about four to six weeks. During that time, we would all visit him on a rotating schedule. After his rehabilitation, he had some mobility and some speech. For the next year and a half, we would take him to Sloan Kettering to see the oncologist.

9. Things were looking better for Chris. His daughter got married in June 2010, and Chris was able to walk Rachel down the aisle. Chris always wanted a house in New Jersey on the water. So, he and his wife found one, and I helped them buy it. He had a really good summer. He was able to go out on the boat with his friends. It was a great couple of months. Toward October, the tumor started growing again, and his symptoms were more severe. They tried another experimental chemotherapy and more radiation, but it didn't work. We took him to


the Farber Institute in Boston to see if he could enroll in any clinical trials, but his cancer was too far along. By the end of November 2011, Chris wasn't functioning very well. He had a steady decline. We should have put him in hospice, but we wanted him to be with family. He managed to get in a wheelchair for Christmas dinner with the family. Ten days later, he died in his own bed at home with the family around him. He left such a big hole in our hearts. Even though it's ten years later, I can hardly describe how much it hurts.

10. When Chris went into surgery in 2010, we didn't know whether he would make it out alive. Before he went into surgery, Chris wrote me a letter. It said, "Thank you for being the best sister you could be. Thank you for making my life, and my children's lives, wonderful." He was supposed to live a long life, and it was cut short because of this stupid toxic pile.

11. This was a young man who befriended everybody. He could have been the mayor, the governor, or the president with his presence. He had an integrity about him that was endearing. Everyone loved him. I fell into a horrific depression for two years after Chris died. My family took me to Mount Sinai for testing, because they thought I had dementia. But it was just a serious depression. It's taken a toll on me, and on all of us. It has taken me eight years after the fact to finally have some normalcy. Chris was loved by all his family and his friends, and he is sorely missed.

  
DEMETRA CHRISTOFILAKES

Sworn to before me this  
13 day of April, 2022

  
Notary Public

**JUL M HALLIGAN**  
Notary Public - State of New York  
No. 01HA6398238  
Qualified in Richmond County  
My Commission Expires Sept. 23, 2023

**Nicholas Christofilakes**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X  
ELAINE E. MANDELKOW., et al.,

Plaintiffs,

**AFFIDAVIT OF  
NICHOLAS CHRISTOFILAKES**

20-CV-00315 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.  
-----X

STATE OF NEW YORK     )  
                                  : SS.:  
COUNTY OF RICHMOND    )

NICHOLAS CHRISTOFILAKES, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 195 Bayview Avenue, Staten Island, NY 10309.

2. My current age is 32, having been born on July 24, 1989.

3. I am the son of Chris Christofilakes, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My father passed away from glioblastoma on January 8, 2012. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. My father was my also my best friend as I reached adulthood. We were both avid sports fans. Anything that involved major league sports we would bond over. Aside from that, we just did regular father-son activities. He was a chef when I was a little kid, and that was another thing we had in common—our love for food.



6. I was just a child on September 11<sup>th</sup>, 2001. I was eleven years old at the time. I knew he was working with other first responders on the rubble pile in the aftermath of the attacks. He was first working on search and recovery and was later there in more of a clean-up capacity. He worked for months on the World Trade Center clean-up effort. In the years after, he continued to work as a court officer in lower Manhattan on Beaver Street and Centre Street. I remember him telling me about how demoralizing it was to work on the clean-up. Of course, he felt camaraderie with the other civil servants who worked at Ground Zero. But no one wanted this experience. He stepped up to the plate because he needed to be there.

7. In the Fall of 2009, we thought my father had suffered a stroke. After more tests and MRIs, he was diagnosed with Stage IV glioblastoma. The thought that he could have brain cancer never even crossed our minds before his diagnosis. I remember the morning of his brain surgery pretty vividly. Following his operation, he wasn't very lucid. When he saw me and recognized me, he kept asking me if he was in heaven. Everyone was crying. He was convinced that he was dead. The nurses asked him a lot of simple questions that he couldn't answer. They recognized that he had swelling in his brain, so they had to take him away and treat him for that.

8. It was terrible watching my father deteriorate day by day. Usually, I have a good way of not letting things get to me, but there's some things you can't forget. He knew how much everyone wanted to help, and in the end, he couldn't even say "thank you." He always used to joke with us, "When I get sick, don't let me suffer. Just shoot me." So, seeing him suffer was pretty horrible.

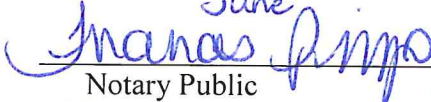
9. I spent a lot of time with him when he got sick. I helped administer his chemotherapy medications at home. I helped him go to the bathroom and fed him. Toward the end, he was non-verbal. He lost control of his voice and the ability to use his hands. He was trapped in his own mind, and he couldn't communicate. I know it was frustrating to him, because being a good communicator was always one of his strengths. You could see the frustration in his eyes.

10. Everyone who knew him knew the caliber of human being that he was. Even though he was taken from us early, you can see what a great impact he had on others. His children—my brother, sister, and I—carry on his legacy. My parents always gave me and my siblings a hard time growing up. They always wondered how we'd turn out. I think my dad would be proud of me today. And that makes me feel proud of myself. It's sad that he didn't get

to see me grow up, but I know that he's watching over us.

  
\_\_\_\_\_  
NICHOLAS CHRISTOFILAKES

Sworn to before me this  
3 day of ~~April~~, 2022

  
\_\_\_\_\_  
Notary Public

